

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

THEODORE LUCIO, et al.,

Case No. 3:15-CV-00613

Plaintiffs,

REPORT OF PARTIES' PLANNING MEETING

v.

Judge Jeffrey Helmick

EDW. C. LEVY CO., et al.,

Defendants.

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on May 7, 2015, and was attended by:

Kevin J. Boissoneault

Counsel for Plaintiffs

Stuart Goldberg

Counsel for Defendant Edw. C. Levy Co.

Jennie K Ferguson

Counsel for Defendant North Star BlueScope Steel

2. The parties:

_____ Have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and the Court's prior order; or

X Will exchange such disclosures by 6/4/15 .

3. The parties recommend the following track:

_____ Expedited X Standard _____ Complex
_____ Administrative _____ Mass Tort

4. This case _____ is/ X is not suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms at this time.

_____ Early Neutral Evaluation _____ Mediation _____ Arbitration
_____ Summary Jury Trial _____ Summary Bench Trial

5. The parties ___ do/ X do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636 (c).

If you are consenting to the jurisdiction of the United States Magistrate Judge, please contact the Judge's Chambers (419 213-5675) prior to the Case Management Conference. A Consent to the Exercise of Jurisdiction will then be issued for signature by all parties and the case will be sent to the Magistrate Judge for the Case Management Conference and all further proceedings.

6. The parties agree that this case _____ does/ X does not involve electronic discovery.

7. Recommended Discovery Plan (Counsel are reminded to review the default standard for e-discovery set forth in Appendix K to the Local Rules):

(a) Describe the subjects on which discovery is to be sought, the nature and extent of discovery and any potential problems: Facts and circumstances; relationship between North Star BlueScope Steel and Edw. C. Levy Co. and Levy Environmental; request for production of documents; interrogatories; depositions.

(b) Describe anticipated e-discovery issues (i.e., what ESI is available and where it resides; ease/difficulty and cost of producing information/; schedule and format of production; preservation of information; agreements about privilege or work-product protection, etc.):

(c) Describe handling of expert discovery (i.e., timetable for disclosure of names and exchange of reports, depositions): Plaintiffs due 11/21/15 (liability only)

Defendants due 12/21/15 (liability only)

Damages experts for both due 30 days before trial

(d) Discovery Deadlines:

(i) Liability: 11/21/15

(ii) Damages: 11/21/15

8. Recommended dispositive motion date: 12/21/15

9. Recommended cut-off for amending the pleadings and/or adding additional parties:

8/21/15

10. Recommended date for status hearing and/or final pretrial settlement conference:

Per Court

11. Other matters for the attention of the Court: This case is related to case 3:14-cv-01849

Attorneys for Plaintiffs: /s/ Kevin J. Boissoneault

Attorneys for Defendants: /s/Stuart Goldberg

/s/ Jennie K Ferguson